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6 *Attorneys for Defendant Northeastern  
Nevada Regional Hospital*

7 *pro hac vice applications to be filed*

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 NEW HORIZON HOME CARE, LLC, and  
12 GUIDING LIGHT HOSPICE, INC.

13 Plaintiffs,

14 -vs-

15 NORTHEASTERN NEVADA REGIONAL  
HOSPITAL, HORIZON HOSPICE, INC.,  
16 GENESIS HOSPICE, LLC, GENESIS  
HOME HEALTH SERVICES, INC.,  
17 HIGHLAND MANOR, DREW BANFORD,  
BILLIE JEAN CRAWFORD, TRAVIS  
18 SPENCER, QUERUBIN IGUBAN, JR.,  
M.D., DEBRA ANDERSON,  
19 MARISELLA (CHELLA) ELLIOT,  
ALICE ALLEN,

20 Defendants.

Case No: 3:19-cv-00521-RCJ-WGC

**STIPULATION AND REQUEST  
FOR EXTENSION OF TIME  
[FIRST REQUEST]**

21 Defendant NORTHEASTERN NEVADA REGIONAL HOSPITAL (“Defendant”), by  
22 and through its counsel PHILLIP F. CRAMER and RYAN T. HOLT of the law firm of  
23 SHERRARD ROE VOIGT & HARBISON, PLC, pursuant to FRCP 6(b)(1)(A) and LR IA 6-  
24 1, respectfully request this Court for an extension of time until December 13, 2019 to provide  
25 a responsive pleading to Plaintiffs’ Complaint in the above-entitled matter for each of the  
26 following reasons:  
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1           1.       Defendant has been acting diligently since obtaining a copy of the Complaint  
2 to obtain a determination with its insurer about coverage and the appointment of defense  
3 counsel, but despite that diligence no final decision has yet been received;

4           2.       This extension request is only for approximately thirty (30) days, and this is the  
5 first request by this Defendant for any extension of time; and

6           3.       Counsel for Plaintiffs is not opposed to extend the time as described above.

7  
8 **DATED:** November 14, 2019.

9 **SHERRARD ROE VOIGT &**  
10 **HARBISON, PLC**  
11 *Attorneys for Defendants*  
12 *Northeastern Nevada Regional Hospital*  
13 *150 3<sup>rd</sup> Avenue South, Ste. 1100*  
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16 *Facsimile: (615) 742-4539*

**DATED:** November 14, 2019.

**KENT LAW**  
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*New Horizon Home Care, LLC and*  
*Guiding Light Hospice, Inc.*  
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By: /s/ Phillip F. Cramer

**PHILLIP F. CRAMER**  
**Tennessee Bar No. 20697**  
**RYAN T. HOLT**  
**Tennessee Bar No. 30191**

By: /s/ Stephen S. Kent

**STEPHEN S. KENT**  
**Nevada Bar No. 1251**  
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*pro hac vice applications to be filed*

**IT IS SO ORDERED:**

William G. Cobb

**UNITED STATES MAGISTRATE JUDGE**

**DATED: November 15, 2019.**